

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KENNETH CREIGHTON,

Plaintiff,

-against-

THE CITY OF NEW YORK, DETECTIVE DEAN
ROBERTS (Shield No. 05861), DETECTIVE
GLENN GODINO (Shield No. 2756), POLICE OFFICERS
JOHN DOES 1-10 (names being fictitious and presently
unknown and intended to be employees of the NYPD who
were involved in Plaintiff's arrest, detention, imprisonment,
and/or prosecution), DISTRICT ATTORNEY ROBERT T.
JOHNSON, ASSISTANT DISTRICT ATTORNEY BRUCE
BIRNS A/K/A BURNS, ASSISTANT DISTRICT
ATTORNEY ED TALTY a/k/a ED TULTY and ASSISTANT
DISTRICT ATTORNEY MICHAEL COOPER,

Defendants.

DECLARATION
REGARDING REDACTED
EXHIBITS SUPPORTING
PLAINTIFF'S MOTION
FOR PARTIAL SUMMARY
JUDGMENT
12 CIV 7454 (PGG)

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STATE OF NEW YORK)
 : SS. :
COUNTY OF NEW YORK)

MATTHEW FLAMM, declares the following under penalty of perjury pursuant to 28

U.S.C. §1746:

1. I am an attorney duly admitted to practice law in the State of New York and am associated with the law firm of Rubert & Gross, P.C, which, together with Pazer, Epstein & Jaffe, P.C., represents plaintiff, Kenneth Creighton.

2. This Declaration places in the public record redacted copies of exhibits supporting plaintiff's motion for Partial Summary Judgment. The Court directed that, rather than filing the exhibits under seal, that they be filed in redacted form.

3. The following redacted exhibits are annexed hereto:

Exhibit J: Spiral notebook maintained by defendant Glenn Godino ("Godino") referable to the subject investigation.

Exhibit T: CI's criminal history records

Exhibit U: Transcript of the deposition of a Confidential Informant

Exhibit BB: Booking Arraignment Disposition Inquiry System Bates stamped NYC004761 - NYC004763 (Spruell Records)

Exhibit FF: CRIMS Appearance History - CREIGHTON, KENNETH Bates stamped NYC005509

Exhibit II: Signed statement of Fawaz Terab

Exhibit JJ: Grand Jury Minutes Bates stamped. NYC 000399 -NYC 000429

Exhibit MM: DD5 Bates Stamped NYC004458

Dated: August 11, 2016


MATTHEW FLAMM